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August 16, 2018

By ECF

Honorable Ronnie Abrams
United States District Court
40 Foley Square
New York, N.Y. 10007

Re: *United States v. Donovan Todd*, 16 Cr. 749 (RA)

Dear Judge Abrams:

Mr. Todd pled guilty today before Magistrate Judge Stewart Aaron to one count of conspiracy to commit wire fraud for his role in a scheme to steal cell phones and other products from Apple stores in California. He is scheduled to be sentenced on November 30, 2018.

I write to respectfully request that the Court advance Mr. Todd's sentencing hearing to a date in mid-October 2018. Mr. Todd (age 25) has no prior criminal record. He has already spent five months in custody. And eight of his co-defendants who have already been sentenced each received brief imprisonment terms, including sentences of time served, nine months, and one year and one day.

The government takes no position on this application.

Respectfully submitted,

/s/

Deborah Colson
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cc: AUSA Nathan Rehn